

Andrew Hunt Lemke Sr. (WSB No. 7-4988)
Supervising Attorney
Protection & Advocacy System, Inc.
7344 Stockman Street
Cheyenne, Wyoming 82009
Telephone: (307) 632-3496
email: lawpanda@wypanda.com

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

PROTECTION & ADVOCACY)	
SYSTEM, INC.,)	
<i>Plaintiff</i>)	Case No.: 22-CV-10-ABJ
)	22-CV-231-ABJ
v.)	
)	
STEFAN JOHANSSON, in his official)	
capacity as Director of the Wyoming)	Plaintiff's Fed. R. Civ. P.,
Department of Health, and PAUL)	Rule 26(a)(2) Disclosure of
MULLENAX, in his official capacity as)	Expert Testimony
Administrator of the Wyoming State)	
Hospital,)	
<i>Defendants</i>)	

Comes Now, Plaintiff Protection & Advocacy System, Inc. ("P&A"), and for its Rule 26(a)(2) Disclosure of Expert Testimony, states as follows:

Pursuant to U.S. District Court, District of Wyoming Local Civil Rule 26.1(e) and court order, Plaintiff P&A, discloses that it has retained **Jane Hudson, J.D.** as an expert witness. Ms. Hudson is the recently retired director of Disability Rights Iowa and was a senior staff attorney with the National Disability Rights Network, where her area of focus was, among other things, abuse and neglect investigations and P&A access authority (**See her attached curriculum vitae**).

Her areas of expertise include, but are not limited to:

- A comprehensive understanding of the authority of protection and advocacy systems under federal law and court-approved agreements to access records, facilities, and individuals;
- The circumstances under which denials and delays of access constitute violations of federal law and court-ordered agreements and potential harm that can occur when access is denied or delayed;
- The general process which P&As follow to protect and advocate for the rights of individuals with disabilities, including the general conduct of abuse and neglect investigations, as well as the provision of legal representation;
- The rights of attorneys (or those they supervise) to meet and communicate with clients and potential clients under rules of professional conduct; and
- Potential remedies, including the imposition of attorneys' fees, in order to ensure that P&As have the right to access records, facilities, and individuals with disabilities.

Ms. Hudson is not a witness who must provide a written report. Fed. R. Civ. P.

26(a)(2)(B).

Pursuant to Local Civil Rule 26.1(e)(5), all special conditions or requirements and expert witness compensation for deposition testimony, are as follows:

- In the event a deposition is conducted remotely, or in the place or vicinity of residence of the expert witness, the rate for the time of deposition testimony is \$60/hour.
- In the event the expert witness will need to travel further for a deposition, the rate for the time of deposition testimony is \$120/hour, and \$60/hour for travel time, and to include all expenses for such travel.

Respectfully Submitted:

January 26, 2023

By: /s/Andrew Hunt Lemke Sr.

Andrew Hunt Lemke Sr. (WSB No. 7-4988)
Supervising Attorney
Protection & Advocacy System, Inc.
7344 Stockman Street
Cheyenne, Wyoming 82009
Telephone: (307) 632-3496
email: lawpanda@wypanda.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Expert Disclosure was served on all counsel of record via CM/ECF, on January 26, 2023.

/s/Andrew Hunt Lemke Sr.

Andrew Hunt Lemke Sr. (WSB No. 7-4988)
Supervising Attorney